

Form G-3 (20230922)

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION                      DIVISION**

In re: Rashonda McClellan	)	Chapter 7
	)	
	)	No. 23-11197
	)	
Debtor(s)	)	Judge David D. Cleary

**NOTICE OF MOTION**

TO: See attached list

PLEASE TAKE NOTICE that on November 15, 2023, at 10:00 a.m., I will appear before the Honorable David D. Cleary, or any judge sitting in that judge's place, **either** in courtroom 644 of the Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn Street, Chicago, IL 60604 **or** electronically as described below, and present the motion of Debtor [to/for] Convert Case to Chapter 13, a copy of which is attached.

**Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.**

**To appear by Zoom using the internet**, go to this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

**To appear by Zoom using a telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

**Meeting ID and passcode.** The meeting ID for this hearing is 161 122 6457, and the passcode is Cleary644. The meeting ID and passcode can also be found on the judge's page on the court's web site.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without calling it.

By: /s/ David Freydin

Attorney for Debtor  
Law Offices of David Freydin  
8707 Skokie Blvd, Suite 312  
Skokie, IL 60077  
847.972.6157

**CERTIFICATE OF SERVICE**

I, David Freydin, certify [if an attorney]/declare under penalty of perjury under the laws of the United States of America [if a non-attorney] that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on November 7, 2023, at 5:00 pm.

/s/ David Freydin

[Signature]

Label Matrix for local noticing  
0752-1  
Case 23-11197  
Northern District of Illinois  
Eastern Division  
Tue Nov 7 13:20:29 CST 2023

Ally Bank, c/o AIS Portfolio Services, LLC  
4515 N Santa Fe Ave. Dept. APS  
Oklahoma City, OK 73118-7901

Ohio Casualty Insurance Company  
c/o Elizer Law Group, LLC  
7366 N Lincoln Avenue  
Suite 305  
Lincolnwood, IL 60712-1740

U.S. Bankruptcy Court  
Eastern Division  
219 S Dearborn  
7th Floor  
Chicago, IL 60604-1702

Ally Bank  
AIS Portfolio Services, LLC  
4515 N Santa Fe Ave. Dept. APS  
Oklahoma City, OK 73118-7901

City of Chicago Water Dept  
1000 East Ohio St  
Chicago IL 60611-3416

Consumer Adjustment  
500 NW Plz  
SI Ann MO 63074-2218

First Premier  
PO Box 1348  
Sioux Falls SD 57101-1348

Indigo Cellic Bank  
PO Box 4477  
Beaverton OR 97076-4401

Mercedes Finance  
PO Box 685  
Roanoke TX 76262-0685

Mercedes-Benz Financial Services USA LLC  
c/o Bk Servicing, LLC  
PO Box 131265  
Roseville, MN 55113-0011

Michael C Kim and Assoc  
19 S Lasalle Ste 303  
Chicago IL 60603-1245

Quantum3 Group LLC as agent for  
Concora Credit Inc.  
PO Box 788  
Kirkland, WA 98083-0788

Quantum3 Group LLC as agent for  
Genesis FS Card Services Inc  
PO Box 788  
Kirkland, WA 98083-0788

Quantum3 Group LLC as agent for  
Sadino Funding LLC  
PO Box 788  
Kirkland, WA 98083-0788

TBOM Milestone  
PO Box 84059  
Columbus GA 31908-4059

THD Home Depot  
PO Box 9001010  
Louisville KY 40290-1010

Ariane Holtschlag, trustee  
FactorLaw  
105 W. Madison  
Suite 1500  
Chicago, IL 60602-4602

Brian P Deshur  
Law Offices of David Freydin Ltd  
8707 Skokie Blvd  
Suite 312  
Skokie, IL 60077-2281

David Freydin  
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8707 Skokie Blvd  
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Skokie, IL 60077-2281

Patrick S Layng  
Office of the U.S. Trustee, Region 11  
219 S Dearborn St  
Room 873  
Chicago, IL 60604-2027

Rashonda McClellan  
18555 Country LN  
Lansing, IL 60438-2582

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)AmeriHome Mortgage Company, LLC

(u)Mercedes-Benz Financial Services USA LLC

(u)NATIONSTAR MORTGAGE LLC

(du)Nationstar Mortgage LLC

End of Label Matrix	6
Mailable recipients	21
Bypassed recipients	4
Total	25

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

**In the Matter of:**

Rashonda McClellan

**Debtor(s)**

}  
}  
}  
}  
}  
}

Case No. 23-11197

Chapter 7

Judge David D. Cleary

**DEBTOR'S MOTION TO CONVERT CASE TO CHAPTER 13**

NOW COMES the Debtor, Rashonda McClellan, by and through her attorney, David Freydin, and in support of their Motion to Convert to Chapter 13, state as follows:

1. On August 25, 2023, the Debtor filed a chapter 7 bankruptcy petition in the Northern District of Illinois, Eastern Division as case number 23-11197.
2. This case was assigned to Trustee Ariane Holtschlag.
3. Debtor is able to fund a Chapter 13 plan because Debtor now has a full-time position.
4. Undersigned counsel has served this motion on all parties and asks that this Honorable Court enter an order converting this case to a chapter 13.

WHEREFORE, the Debtor respectfully requests that this Honorable Court enter an order converting this case to chapter 13 and grant such other and further relief as it deems fair and just.

Respectfully Submitted,

/s/ David Freydin

David Freydin  
Law Offices of David Freydin  
8707 Skokie Blvd, Suite 312  
Skokie, IL 60077  
847.972.6157